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**MEMO ENDORSED** 

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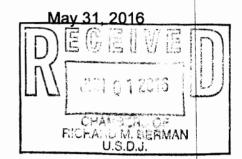
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## UNDER SEAL

## **VIA HAND DELIVERY**

Honorable Richard M. Berman United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007



Re: <u>United States v. Reza Zarrab</u>, S1 15 Cr. 867 (RMB)

## Dear Judge Berman:

As your Honor is aware, this firm represents **REZA ZARRAB** in connection with the above-captioned Indictment.

We respectfully enclose the original affirmation of Joseph Jaffe, Chief Compliance Officer, Deputy General Counsel and Senior Managing Director of Guidepost Solutions, LLC as referenced in our Reply Memorandum in Support of Mr. Zarrab's Bail Application filed earlier today. Due to the sensitive nature of the security concerns discussed in the affirmation, we respectfully request that your Honor file this affirmation under seal.

Thank you for the courtesy your Honor has always extended to counsel in all proceedings.

Respectfully

Ben Brafman

cc: Sidhardha Kamaraju (Sidhardha Kamaraju@usdoj.gov) Michael Lockard (Michael Lockard@usdoj.gov) The Court believes that openness - - not sealing - - is invariably the best approach. The only privacy related matter in the Jaffe affirmation appears to be the address in paragraph 7 which may be redacted. The Jaffe affirmation should be refiled today on the public docket without the address.

SO ORDERED:

Date: June 1, 2016

Richard M. Berman, U.S.D.J.